

American Civil Liberties Union, et al.,

v.

Alberto R. Gonzales, In His Official Capacity As Attorney General Of The United States

Case No.: 98-CV-5591

EXHIBIT A

Third Party Choicepoint Inc.'s Emergency Motion For A Protective Order And Memorandum Of Law In Support

1

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF PENNSYLVANIA
4 Civil Action No. 98-CV-5591

5 -----x

6 AMERICAN CIVIL LIBERTIES UNION, et al.,

7 Plaintiffs,

8 vs.

9 ALBERTO R. GONZALES, in His official
10 capacity as Attorney General of the
11 United States,

12 Defendant.

13 -----x

14

15 DEPOSITION OF KEN MEISER
16 PORTIONS DEEMED CONFIDENTIAL

17 Atlanta, Georgia

18 March 29, 2006

19

20

21

22

23 Reported by:

24 JEAN MORALEE

25

1 A. A good point here. I think both our
2 XML services and batch services are listed on here
3 as services that we offer. And in those cases,
4 you could argue that age verification services are
5 a subset of the authentication services as well as
6 available via batch and our XML services.

7 Q. I would like to direct your attention
8 to Exhibit 1.

9 MR. GILFILLAN: Since we're back to
10 this document, which is produced subject to the
11 protective order, to the extent you're asking
12 about this document, this part of the deposition
13 will be subject to the protective order that has
14 been entered in the case.

15 BY MR. FRIEDMAN:

16 Q. I want to focus on the sources of data.
17 Do you see that there? I'm sorry. Page 17. I
18 thought I already told you a page.

19 A. Yes, I do.

20 Q. I'll just read aloud the first couple
21 of sentences.